

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

THE TRUSTEES OF PURDUE  
UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS N.V.,  
STMICROELECTRONICS  
INTERNATIONAL N.V., and  
STMICROELECTRONICS, INC.,

Defendants.

Civil Action No. 6:21-CV-00727-ADA

**DEMAND FOR JURY TRIAL**

**EXHIBIT C**

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**From:** Li Chen <Lchen@lumenslawgroup.com>  
**Sent:** Tuesday, May 24, 2022 4:36 PM  
**To:** Michael Shore; Alfonso Chan; Mark Siegmund; Halima Shukri Ndai; Max Ciccarelli; Cohen, Justin S (DFW - X61211); Sostek, Bruce S (DFW - X61234)  
**Cc:** Marlaina Wright  
**Subject:** RE: Purdue v. ST Int'l NV: Notice of Defective Service

Hi Michael:

I'll share the below with my client. Whether ST-INT'L has been properly served, of course, is an issue over which the parties disagree. But it seems to me there are multiple ways to address this issue. For example (and I still need to vet this with my client), would it address your concern if ST-INT'L agreed to alternative email service on counsel?

Li Chen  
Managing Director  
Direct: 214.627.9955  
[LChen@LumensLawGroup.com](mailto:LChen@LumensLawGroup.com)



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**From:** Michael Shore <mshore@shorechan.com>  
**Sent:** Tuesday, May 24, 2022 4:24 PM  
**To:** Li Chen <Lchen@lumenslawgroup.com>; Alfonso Chan <achan@shorechan.com>; Mark Siegmund <msiegmund@shorechan.com>; Halima Shukri Ndai <hndai@shorechan.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>; Sostek, Bruce S (DFW - X61234) <Bruce.Sostek@hklaw.com>  
**Cc:** Marlaina Wright <MWright@lumenslawgroup.com>  
**Subject:** RE: Purdue v. ST Int'l NV: Notice of Defective Service

Li,

If ST International NV will formally stipulate that it has been effectively served with the Complaint, Purdue will withdraw the motion for default judgment and extend the answer/response date to May 30.

The issue of service must be off the table for the default to be withdrawn.

Michael

Sent via the Samsung Galaxy S22 5G, an AT&T 5G smartphone

----- Original message -----

From: Li Chen <[Lchen@lumenslawgroup.com](mailto:Lchen@lumenslawgroup.com)>

Date: 5/24/22 3:29 PM (GMT-06:00)

To: Michael Shore <[mshore@shorechan.com](mailto:mshore@shorechan.com)>, Alfonso Chan <[achan@shorechan.com](mailto:achan@shorechan.com)>, Mark Siegmund <[msiegmund@shorechan.com](mailto:msiegmund@shorechan.com)>, Halima Shukri Ndai <[hndai@shorechan.com](mailto:hndai@shorechan.com)>

Cc: Marlaina Wright <[MWright@lumenslawgroup.com](mailto:MWright@lumenslawgroup.com)>

Subject: Purdue v. ST Int'l NV: Notice of Defective Service

**CAUTION: External Email!**

Dear counsel:

Please see the attached.

Best,

Li

Li Chen  
Managing Director  
Direct: 214.627.9955  
[LChen@LumensLawGroup.com](mailto:LChen@LumensLawGroup.com)



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